

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SAJU VARGHESE,

Plaintiff,

v.

JPMORGAN CHASE & CO. and
JPMORGAN CHASE BANK, N.A.,

Defendants.

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: **ELECTRONICALLY FILED**
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: **Docket No. 14-CV-1718-PGG**
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DECLARATION OF THOMAS A. LINTHORST

I, Thomas A. Linthorst, declare the following:

1. I am an attorney with the law firm of Morgan, Lewis & Bockius LLP, counsel for Defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. in the above-captioned lawsuit. I have personal knowledge of the statements made in this Declaration.

2. The Court's December 16, 2015 Order determining the scope of the case did not set any time to respond to the discovery, so Defendants were proceeding on their proposal, made in their request for a protective order (Dkt. No. 62), to consider the requests served on the date the Court issued its Order.

3. When the Court made clear at the December 29, 2015 conference that it wanted the documents produced "forthwith," Defendants produced documents two days later.

4. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the deposition of Saju Varghese dated January 12, 2016.

5. Attached hereto as Exhibit 2 is a true and correct copy of the declaration of Michael Garcia.

6. Attached hereto as Exhibit 3 is a true and correct copy of the declaration of Sandra Franklin.

7. Attached hereto as Exhibit 4 is a true and correct copy of the declaration of Ivelisse Salcedo.

8. Attached hereto as Exhibit 5 is a true and correct copy of the declaration of Armando Angarita.

9. Attached hereto as Exhibit 6 is a true and correct copy of the declaration of Yessenia Ventura.

I declare under the penalty of perjury that the foregoing is true and correct.

/s/Thomas A. Linthorst

Thomas A. Linthorst

Executed on this 19th day of January 2016.